

EXHIBIT A

(Plaintiff's Proposed Case Management Scheduling Order)

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

**JOSEPH R. HERRON, individually and
On behalf of all others similarly situated,**

Plaintiff,

v.

INVESTMENT PROFESSIONALS, INC.,

Defendant.

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Civil Action No. 2:15-cv-01664-MPK

Chief Magistrate Judge Maureen P. Kelly

[PROPOSED] CASE MANAGEMENT SCHEDULING ORDER

AND NOW, this ____ day of _____, 2016, IT IS HEREBY
ORDERED as follows:

- 1) The class certification discovery deadline is extended to January 13, 2017;
- 2) Plaintiff shall be permitted to conduct one Rule 30(b)(6) deposition of a representative of Defendant during this discovery period;
- 3) To facilitate the Rule 30(b)(6) deposition, the parties shall meet and confer with respect to Plaintiffs' first request for production of documents by November 18, 2016;
- 4) All other current case deadlines are stayed pending resolution of Defendant's motion for summary judgment and Plaintiff's motion for conditional collective action certification;
- 5) Within 10 days after the Court rules on the aforementioned motions (whichever order is later, and assuming the case is not dismissed), the parties are to meet, confer and submit an appropriate joint Case Management Scheduling Order to govern the next phase of this case.

By the Court:

Hon. Maureen P. Kelly
Chief Magistrate Judge

